

# Exhibit A

**From:** [Frank H. Stoy](#)  
**To:** [Layne Hilton](#); [Lockard, Victoria D. \(Shld-Atl-LT\)](#); "[DECValsartan@btlaw.com](#)"  
**Cc:** [Conlee Whiteley](#); [Ruben Honik](#); [Daniel Nigh](#); [John Davis](#); [David J. Stanoch](#); [rosemarie.bogdan@1800law1010.com](#)  
**Subject:** Re: [EXTERNAL]Najafi Deposition  
**Date:** Monday, January 10, 2022 10:12:27 PM  
**Attachments:** [image058950.png](#)  
[image944303.png](#)

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Layne,

February 3 will work for Dr. Najafi's deposition. With regard to the location of the deposition, as with Ms. Craft, Defendants would prefer to wait until closer in time to determine whether it should occur in-person or via Zoom.

Thanks,  
Frank

**Frank H. Stoy, Esquire**

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**From:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>

**Date:** Monday, January 10, 2022 at 10:24 AM

**To:** "[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)" <[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)>, "[DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)" <[DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)>

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**Subject:** [EXTERNAL]Najafi Deposition

Victoria:

I write regarding the deposition of Dr. Najafi. He is no longer able to be deposed on January 20<sup>th</sup>. He is available on either February 2<sup>nd</sup> or February 3<sup>rd</sup> to sit for a deposition.

Additionally, like Ms. Craft, it is his strong preference to conduct the deposition entirely remotely via zoom due to the current situation with the pandemic.

Please let us know which date works for the Defendants.

Best,

Layne

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